

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Anthony J. Costanzo Kimberly A. Katchen-Costanzo aka Kimberly A. Katchen <u>Debtors</u> US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust <u>Moving Party</u> vs. Anthony J. Costanzo Kimberly A. Katchen-Costanzo aka Kimberly A. Katchen <u>Debtors</u> and Scott F. Waterman <u>Trustee</u>	Chapter 13 NO. 20-13982 AMC 11 U.S.C. Section 362
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CERTIFICATION OF DEFAULT

I, Mark A. Cronin, Esquire, attorney for Moving Party, certify that Debtors have defaulted upon the terms of the Stipulation. It is further certified that the attached notice dated October 18, 2023, was served upon the Debtors and Debtors' Attorney on said date. Subsequent to said notice, the Debtors have failed to cure the default. Accordingly, the Court shall enter the attached Order granting the Moving Party relief from the automatic stay.

December 4, 2023

/s/ Mark A. Cronin
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